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VIA ELECTRONIC CASE FILING

United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Attn: Hon. Kiyo A. Matsumoto

Re: Jennette and Henry v. Davis, et al.
Case No.: 1:18-cv-02291 (KAM)(CLP)

Dear Honorable Madam:

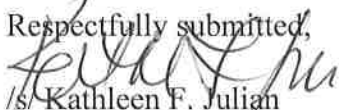
We are the attorneys for the Plaintiffs in the above referenced matter. We are writing to request an extension of time to complete service of all of the Defendants in the within action.

While there are twenty-three (23) defendants in the within action, the main defendant, Kevin Davis, is the sole member of the 21 LLC defendants and, as such, is the individual who needs to be served in order to affect service on all but one of the defendants. Nancy Givons-Davis, Kevin Davis' wife, is the only other defendant in this matter who must be personally served.

Despite having their home and office addresses, the Davis' have been vigorously alluding service in this matter. My process server advises me that after attempting service at all of the office addresses listed for the LLCs, they were advised that Mr. Davis is never present there. As such, my process servers have focused their efforts on Mr. and Mrs. Davis personal residence. The Davis' live in a gated community and, have called the local police to prevent my process servers from entering the community, though after explaining the situation, the police allowed them to enter, and the Davis' refuse to open their door in order to allow my process servers to affect service upon them. I am annexing hereto the Affidavit of Due Diligence of my process server outlining the efforts made by them in attempting to serve the defendants.

As the statutory time to serve the defendants is about to expire, we respectfully request that the Court grant us an additional ninety (90) day extension to complete service and allow us to serve the individual Defendants by substituted service under Virginia Rules of Civil Procedure §8.01-296(2), the Virginia LLC defendants under Virginia Rules of Civil Procedure §13.1-836(B), the North Carolina LLC Defendants, under North Carolina Rules of Civil Procedure Rule 4(j)(6)(c) the Tennessee LLC Defendant under Tennessee Rules of Civil Procedure 4B and the Maryland LLC Defendant under Maryland Rules of Civil Procedure §2-121, pursuant to Federal Rule (4)(e) (1).

May we hear from you as soon as possible.

Respectfully submitted,

/s/ Kathleen F. Julian
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cc: Alvena Jennette
Robert Henry